



DANIEL S. HALLAK
ASSOCIATE

DIRECT TEL.: 516.355.9628
DIRECT FAX: 516.355.9660
DHALLAK@RFRIEDMANLAW.COM

February 28, 2020

VIA ECF

Honorable Judge Ramon E. Reyes
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Room N208
Brooklyn, New York 11201

Re: *Chalamo Kaikov v. Arihay Kaikov, et al.*
Docket No.: 19-CV-02521; File No.: L2805

Dear Judge Reyes:

Please be advised that this office represents Defendants Arihay Kaikov, Pacific 2340 Corp., Royal A&K Realty Group, Inc., A&E.R.E. Management Corp., NY Prime Holding, LLC, and AG Realty Bronx Corp. (collectively, the “Kaikov Defendants”) in the above-referenced matter. Plaintiff and the Kaikov Defendants respectfully submit this Status Letter pursuant to Your Honor’s Order dated February 14, 2020.

To briefly memorialize, the parties appeared telephonically for a conference held by Your Honor on February 14, 2020, following oral argument of the Kaikov Defendants’ Motion to Dismiss, Plaintiff’s Motion for a Preliminary Injunction and Plaintiff’s Motion for a Temporary Restraining Order.¹ At the conference, Your Honor directed the Kaikov Defendants to counter Plaintiff’s demand by February 21, 2020. In compliance with that directive, the Kaikov Defendants had countered Plaintiff’s demand, which was subsequently rejected by the Plaintiff. However, in rejecting the offer, the parties subsequently conferred and are in agreement that a Settlement Conference in front of Your Honor would be beneficial with the hope of resolving all claims related to this action.

Pursuant to the above, the parties hereby respectfully request that Your Honor hold a Settlement Conference with all parties present. Plaintiff’s counsel has advised that her client, who currently lives in Russia, will be present in the United States and available for an in-person

¹ The Law Firm Defendants were dismissed following oral argument of the motion by the Honorable Judge Jack Weinstein.



February 28, 2020
Joint Status Letter
Page 2

Settlement Conference on April 6, 2020, April 7, 2020 and any day during the week of April 13, 2020. Those dates are also convenient for the Kaikov Defendants.

We thank the Court for its time and consideration.

Respectfully submitted,
THE RUSSELL FRIEDMAN LAW GROUP, LLP

By: /s/ Daniel S. Hallak
Daniel S. Hallak

cc: All counsel (via ECF)